

## John Fishwick

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**From:** simonetttil@gtlaw.com  
**Sent:** Tuesday, July 2, 2019 12:14 PM  
**To:** John Fishwick  
**Cc:** allenmayed@gtlaw.com; Monica Mroz; ramosc@gtlaw.com; hassm@gtlaw.com; jlong@woodsrogers.com; bwaller@woodsrogers.com; Carroll Ching; Daniel Martin; Amy Guthrie  
**Subject:** Re: W. Henderson v. General Revenue Corporation, et al.

We have reviewed your letter, received yesterday afternoon, and will not be able to respond by tomorrow. I am in a meeting and deposition, and tomorrow is the day before the holiday. We will have to get back to you next week.

Sent from my iPad

On Jul 1, 2019, at 1:32 PM, John Fishwick <[John.Fishwick@fishwickandassociates.com](mailto:John.Fishwick@fishwickandassociates.com)> wrote:

**\*EXTERNAL OF GT\***

Good Afternoon, Attached is correspondence in the above styled case. Thank you for your attention to this matter. Best, John

<image002.jpg><image003.jpg>

**John P. Fishwick, Jr. | Fishwick & Associates, PLC**  
30 Franklin Road, Suite 700 | Roanoke, VA 24011  
Phone 540.345.5890 | Facsimile 540.345.5789

[john.fishwick@fishwickandassociates.com](mailto:john.fishwick@fishwickandassociates.com) | [www.fishwickandassociates.com](http://www.fishwickandassociates.com)

<image005.jpg>

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**From:** [allenmayed@gtlaw.com](mailto:allenmayed@gtlaw.com) <[allenmayed@gtlaw.com](mailto:allenmayed@gtlaw.com)>  
**Sent:** Friday, June 28, 2019 2:40 PM  
**To:** Monica Mroz <[Monica.Mroz@fishwickandassociates.com](mailto:Monica.Mroz@fishwickandassociates.com)>; John Fishwick <[John.Fishwick@fishwickandassociates.com](mailto:John.Fishwick@fishwickandassociates.com)>  
**Cc:** [simonetttil@gtlaw.com](mailto:simonetttil@gtlaw.com); [ramosc@gtlaw.com](mailto:ramosc@gtlaw.com)  
**Subject:** W. Henderson v. General Revenue Corporation, et al.

Dear Counsel,

Attached are Navient Portfolio Management, LLC's responses to plaintiff's interrogatories and request for documents.

Desiree Allen-Maye  
Paralegal



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1840 Century Park East  
Suite 1900 | Los Angeles, CA 90067-2121  
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[allenmaved@gtlaw.com](mailto:allenmaved@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com)

<image006.png>

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## John Fishwick

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**From:** hassm@gtlaw.com  
**Sent:** Tuesday, July 2, 2019 3:33 PM  
**To:** John Fishwick; simonettil@gtlaw.com  
**Cc:** allenmayed@gtlaw.com; Monica Mroz; ramosc@gtlaw.com; jlong@woodsrogers.com; bwaller@woodsrogers.com; Carroll Ching; Daniel Martin; Amy Guthrie  
**Subject:** RE: W. Henderson v. General Revenue Corporation, et al.

John,

Your blanket assertion that NPM will not comply with your discovery requests is unfounded. Moreover, your rush to file a Motion to Compel without conducting a meet-and-confer violates the Court's rules. We are happy to confer with you so that we can narrow the issues in dispute, but we have simply asked for more time to review and respond to the issues raised in your letter. Demanding total compliance with your demands in two days, during a holiday week, and when we have informed you that we are in depositions and meetings, is simply unreasonable and is not in good faith.

We will gladly set up a time with you next week after the holiday to discuss your letter and work with you in good faith to narrow any disputed issues, just as both sides have done throughout discovery to date; to that end, please let us know when you are available for a meet-and-confer. Should you file a Motion to Compel in the meantime, without such a good faith attempt to confer with us, we will be sure to note the same in any response to the Court.

Thank you,  
Mike

**Michael A. Hass**  
Associate

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[hassm@gtlaw.com](mailto:hassm@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com) | [View GT Biography](#)

 **GreenbergTraurig**

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**From:** John Fishwick [mailto:[John.Fishwick@fishwickandassociates.com](mailto:John.Fishwick@fishwickandassociates.com)]  
**Sent:** Tuesday, July 2, 2019 1:31 PM  
**To:** Simonetti, Lisa (Shld-LA-LT) <[simonettil@gtlaw.com](mailto:simonettil@gtlaw.com)>  
**Cc:** Allen-Maye, Desiree (Para-LA-LT) <[allenmayed@gtlaw.com](mailto:allenmayed@gtlaw.com)>; Monica Mroz <[Monica.Mroz@fishwickandassociates.com](mailto:Monica.Mroz@fishwickandassociates.com)>; Ramos, Christopher R. (Assoc-LA-LT) <[ramosc@gtlaw.com](mailto:ramosc@gtlaw.com)>; Hass, Michael A. (Assoc-NVA-LT) <[hassm@gtlaw.com](mailto:hassm@gtlaw.com)>; jlong@woodsrogers.com; bwaller@woodsrogers.com; Carroll Ching <[Carroll.Ching@fishwickandassociates.com](mailto:Carroll.Ching@fishwickandassociates.com)>; Daniel Martin <[daniel.martin@fishwickandassociates.com](mailto:daniel.martin@fishwickandassociates.com)>; Amy Guthrie <[Amy.Guthrie@fishwickandassociates.com](mailto:Amy.Guthrie@fishwickandassociates.com)>  
**Subject:** RE: W. Henderson v. General Revenue Corporation, et al.

Good Afternoon:

Since your client is not going to comply with our discovery requests, we, as noted in our July 1, 2019 letter, will promptly file a motion to compel and ask the Court for some hearing dates. Best, John



**John P. Fishwick, Jr. | Fishwick & Associates, PLC**

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**Cc:** [allenmayed@gtlaw.com](mailto:allenmayed@gtlaw.com); [Monica Mroz](mailto:Monica.Mroz@fishwickandassociates.com) <[Monica.Mroz@fishwickandassociates.com](mailto:Monica.Mroz@fishwickandassociates.com)>; [ramosc@gtlaw.com](mailto:ramosc@gtlaw.com); [hassm@gtlaw.com](mailto:hassm@gtlaw.com); [jlong@woodsrogers.com](mailto:jlong@woodsrogers.com); [bwaller@woodsrogers.com](mailto:bwaller@woodsrogers.com); [Carrol Ching](mailto:Carrol.Ching@fishwickandassociates.com) <[Carrol.Ching@fishwickandassociates.com](mailto:Carrol.Ching@fishwickandassociates.com)>; [Daniel Martin](mailto:Daniel.Martin@daniel.martin@fishwickandassociates.com) <[daniel.martin@fishwickandassociates.com](mailto:daniel.martin@fishwickandassociates.com)>; [Amy Guthrie](mailto:Amy.Guthrie@fishwickandassociates.com) <[Amy.Guthrie@fishwickandassociates.com](mailto:Amy.Guthrie@fishwickandassociates.com)>

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**Desiree Allen-Maye**  
Paralegal

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